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August 4, 2021

By ECF

Hon. Allyne R. Ross, U.S.D.J.  
U.S. District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: **Michelle Tenzer-Fuchs v. ZENB US, Inc., Index No. 2:21-cv-03337-ARR-JMW**

Dear Judge Ross:

We represent defendant ZENB US, Inc. ("Defendant") in the above-referenced action and write to request a 30-day extension of time to answer or otherwise plead in response to the complaint. The initial deadline was August 5, 2021. This is Defendant's first request for an extension of time. Counsel for Plaintiff has consented to this request.

We request an extension to afford the parties an opportunity to discuss an early resolution of the matter before incurring additional time and expense. In addition, counsel for Defendant have only recently been retained and seek additional time to familiarize ourselves with the complaint and underlying facts. No party would be prejudiced by the requested extension.

Defendant therefore respectfully requests entry of an order extending its time to answer or otherwise plead to September 6, 2021.

Thank you for your consideration.

Respectfully,

LOCKE LORD LLP

/s/ Andrew Braunstein

Atlanta | Austin | Boston | Chicago | Cincinnati | Dallas | Hartford | Hong Kong | Houston | London | Los Angeles | Miami  
Morristown | New Orleans | New York | Providence | Sacramento | San Francisco | Stamford | Washington DC | West Palm Beach

CC: Hon. James M. Wicks, U.S.M.J. (by ECF)

All parties entitled to notice (by ECF)

Simon Fleischmann (by Email)